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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

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IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**[PROPOSED] ORDER GRANTING  
FACEBOOK, INC.'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL THE  
SPECIAL MASTER'S AMENDED ORDER  
REGARDING PRODUCTION OF NAMED  
PLAINTIFF DATA**

**[PROPOSED] ORDER**

The Court has considered Facebook, Inc.'s ("Facebook") Administrative Motion to File Under Seal the Special Master's Amended Order Regarding Production of Named Plaintiff Data, which proposes to seal the following portions of the Order and its attached exhibits:

<b>Document</b>	<b>Portions Sought to be Sealed</b>
The Special Master's Amended Order Regarding Production of Named Plaintiff Data	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order at ¶¶ 18–21, 18 n. 2, 24, 26, 32.</li> <li>Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Order at ¶¶ 19–23, 28, 30.</li> </ul>
Order Exhibit D	<ul style="list-style-type: none"> <li>Limited portions that contain confidential information that the Court previously found good cause to seal, which redactions Special Master Garrie included in the otherwise unredacted version of his Order and associated exhibits. Order Ex. D at 9–10, 12.</li> </ul>
Order Exhibit H	<ul style="list-style-type: none"> <li>Limited portions that contain confidential information that the Court previously found good cause to seal. Order Ex. H at 1–4.</li> </ul>
Order Exhibit I	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. I at Tr. at 8:13–25, 9:1–8, 24–25, 10:1–2, 7–8, 10, 13–14, 21, 24–25, 11:1, 11, 11:13–15, 20–25, 12:8, 13:19–23, 25, 14:1–4, 8, 18, 22, 25, 15:12–20, 22–25, 16:2, 7, 10, 17:8, 18:8, 19, 22–23, 19:5–6, 12–13, 16–21, 23–25, 20:1, 3–9, 13–21, 21:2, 8–10, 15–16, 25, 22:2, 7, 13–15, 17–22, 23:5–9, 13, 15, 21–24, 24:12–14, 17–18, 20–21, 24, 25:8, 11, 17, 22, 26:6, 11–15, 17–20, 22–25, 27:1–3, 6, 9, 17, 29:2–5, 10–11, 14–15, 21–23, 25, 30:4, 7–8, 11, 14–17, 19–20, 25, 31:2, 11–13, 32:5–7, 12, 17–18, 21–24, 33:17, 19, 21–23, 25, 34:1, 4, 9, 12–13, 16, 18–21, 23, 35:10–11, 36:3, 7, 18, 37:10–14, 20–21, 23–24, 38:2, 9–10, 24–25, 39:1–3, 9, 21, 24, 40:5–8, 10, 41:2, 6, 18, 42:4, 10–11, 14–15, 43:1–4, 24, 44:2–4, 15, 45:2–3, 7, 13–14, 17–20, 46:14, 16, 47:13, 21, 48:12, 24, 49:3, 9–11, 18, 20–21, 51:8, 16, 52:9–14, 54:5, 14–15, 20–24, 55:1, 4–5, 24, 56:15, 57:3, 10–11, 18, 58:15, 59:8, 21–22, 60:12–15, 22, 61:1, 11, 15, 21, 24, 62:10, 14, 24, 63:6–7, 9, 18, 64:5, 7, 12, 14, 18, 25, 65:6, 25, 66:4–5, 25, 67:4–7, 16–22, 24, 68:2, 16, 20–21, 69:3, 12, 23, 70:2, 4–5, 8, 12–13, 71:24, 72:5, 10, 73:5, 25, 74:23, 75:15, 76:2–7, 10, 12, 15, 18, 77:3, 78:16–20, 23–25, 80:9, 81:25, 82:1–2, 5–6, 84:25, 85:11, 19, 86:11, 87:2, 7, 12, 20, 88:10, 20, 23, 25, 90:8, 91:20, 92:5–7, 9, 21, 93:4, 14, 16, 19, 94:7, 10, 13–14, 95:6, 11, 14, 18, 96:6, 8, 19, 22, 97:8, 13, 21–22, 98:3, 6, 10, 14, 20–21, 23–24, 99:1, 4, 17, 20, 25, 100:3, 13, 101:5, 13, 19, 23, 102:1, 8, 10–12, 103:3, 5, 10, 12–14, 104:17–19, 105:23–24, 106:11–13, 15, 19, 23, 25, 107:1, 8–9, 13, 20, 108:3, 13, 15, 19, 22, 25, 109:5–8, 13, 19, 110:3, 12, 15, 22, 24,</li> </ul>

	<p>111:3, 6, 8, 15, 17, 19, 112:2, 4–6, 9, 12, 113:2, 13, 15, 18, 21, 114:11, 18, 21, 25, 115:3, 11, 116:10, 18–20, 119:3–5, 18–19, 21–22, 121:16–17, 126:3–4, 6–10, 12, 16, 127:1, 4, 6–8, 11–13, 16–20, 22, 24–25, 128:7, 11–12, 131:16–17, 21–22, 132:2–3, 133:13.</p> <ul style="list-style-type: none"> <li>The identities of consulting experts retained by Gibson Dunn to provide professional services related to ADI, whose identities the Court has previously found good cause to seal. Order Ex. I at Tr. at 133:13.</li> </ul>
Order Exhibit J	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. J at Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data.</li> </ul>
Order Exhibit K	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. K at 2–7.</li> </ul>
Order Exhibit L	<ul style="list-style-type: none"> <li>The names of Facebook's confidential business partners, which the Court has previously found good cause to seal. Order Ex. L at Tr. at 139:21, 140:2–3.</li> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. L at Tr. at 28:17–23, 29:16–23, 30:3, 16, 22, 31:6–7, 42:21–23, 43:1, 5, 7–8, 13, 21, 44:1, 6–7, 13–16, 19, 45:1, 3, 19, 21, 47:6–7, 54:5–6, 12, 66:18, 22, 67:1, 7, 10, 12, 14–15, 17–19, 68:9, 11–13, 16, 19–21, 70:21–71:2, 83:9–10, 84:17, 85:22, 24, 91:8–9, 14–15, 92:16, 18, 93:2–4, 94:8–9, 14, 19–23, 96:3, 5–6, 8, 19, 21, 25, 97:4, 98:1, 3, 10–13, 99:8, 100:5, 11, 14, 17–18, 105:9–22, 106:2, 110:22, 111:20, 112:1, 4–5, 18, 116:18–20, 121:19–22, 124:17, 130:2–3, 25, 131:10–11, 13–15, 132:12, 133:10–12, 14–16, 135:16–21, 140:9, 146:23–147:9, 151:5, 11–12, 15, 153:22, 25, 154:1, 4, 10, 13–14, 20, 23–24, 155:2–3, 9, 18, 21, 24, 156:7, 14, 157:5–6, 10, 13, 16, 19, 25, 158:1–2, 5, 15–16, 19–21, 25, 159:1–2, 160:8, 11, 20, 161:14, 23–24, 162:7–8, 10, 22, 25, 163:4, 8, 14, 24, 164:3, 5–6, 14, 18, 23, 166:13–15, 19, 167:5, 21–24, 168:1, 7, 23–24, 169:3, 6.</li> <li>Limited portions that reveal confidential information regarding Facebook's privacy and platform policy enforcement practices. Order Ex. L at Tr. at 128:10–11, 13–16; 158:11–12.</li> </ul>
Order Exhibit M	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information with language that Facebook has previously requested that the Court seal. Order Ex. M at 6–9.</li> </ul>
Order Exhibit N	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. N at Tr. at 16:7–8, 15–16, 22, 17:8, 11, 14–16, 18–19, 18:7, 9–11, 22–24, 19:16, 20:6, 21:9–14, 23–25, 27:6–7, 10, 13, 15–16, 19–22, 24–25, 28:2–4, 9–17, 20–22, 29:1–4, 21, 30:1–7, 18–25, 31:1, 8–10, 14, 24, 33:4, 13–14, 23–25, 34:4–5, 35:1, 36:8–12, 14–15, 18, 21, 24–25, 37:6–7, 10–14, 16–20, 22–23, 25, 38:4, 11, 19, 25, 39:3, 8,</li> </ul>

	<p>44:10–14, 50:15–21, 51:9, 12–16, 19, 23–25, 52:1, 9–12, 24–25, 53:9–10, 54:5, 11–14, 55:11–14, 56:1–3, 17–24, 57:1–2, 4–5, 7–11, 15–16, 67:22–25, 68:1–3, 69:18–21, 72:24–25, 73:4, 21–23, 74:3–6, 75:4–8, 13, 18–25, 76:2–7, 14–16, 18, 21, 23–25, 81:1–2, 23–25, 82:14, 85:1–2, 86:13–14, 88:13–25, 89:1–2, 90:20–25, 91:1–4, 92:2, 5–6, 13, 18–24, 93:1–4, 102:17–18, 103:2, 4, 12, 105:16, 21–22, 106:3–6, 8, 17, 25, 107:15, 108:7, 23–25, 109:2, 11–15, 18–20, 25, 110:2, 6, 10, 15, 111:10, 14–19, 112:2, 5, 7, 20–25, 113:1–4, 16, 114:17, 24, 115:7, , 118:2–9, 11–16, 119:8–11, 14–17, 19–21, 25, 120:1–7, 17–21, 23–24, 121:3–4, 6, 8–11, 124:22, 127:1–2, 10–11, 13–17, 19–21, 23–25, 130:10, 19, 21, 135:3–6, 140:23–24, 142:1, 15, 143:20–25, 145:3–4, 6–8, 12–13.</p> <ul style="list-style-type: none"> <li>• Limited portions that reveal confidential information regarding Facebook’s privacy and policy enforcement practices. Order Ex. N. at Tr. at 26:3–7, 58:11–14, 16–18, 59:1.</li> <li>• The name of one of Facebook’s confidential business partners, which the Court has previously found good cause to seal. Order Ex. N at Tr. at 66:4, 11, 138:24, 139:24–25, 141:1, 142:18.</li> <li>• Limited portions that reveal proprietary details of a data set that Facebook acquires, which Facebook has previously requested that the Court seal. Order Ex. N at Tr. at 146:2, 4, 9–10, 147:13–14, 148:4, 151:23, 152:3, 7.</li> </ul>
Order Exhibit P	<ul style="list-style-type: none"> <li>• Limited portions that reveal confidential information with language that Facebook has previously requested that the Court seal. Order Ex. P at 1–2, 4, 6–7.</li> </ul>
Order Exhibit Q	<ul style="list-style-type: none"> <li>• Limited portions that quote or otherwise reveal confidential information with language that Facebook has previously requested that the Court seal. Order Ex. Q at 2–4, 6, 9–13.</li> <li>• Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Order Ex. Q at 6–7.</li> </ul>
Order Exhibit R	<ul style="list-style-type: none"> <li>• A limited portion that reveals confidential information with language that Facebook has previously requested that the Court seal. Order Ex. R at 2.</li> </ul>
Order Exhibit S	<ul style="list-style-type: none"> <li>• Limited portions that quote or otherwise reveal confidential information with language that Facebook has previously requested that the Court seal. Order Ex. S at 2–3.</li> <li>• Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Order Ex. S at 4.</li> </ul>
Order Exhibit T	<ul style="list-style-type: none"> <li>• Limited portions that reveal confidential information regarding Facebook’s proprietary data systems and data storage and processing practices. Order Ex. T at 1–3, Internal Ex. A at 1–6.</li> <li>• A limited portion that reveals confidential information with language that Facebook has previously requested that the Court seal. Order Ex. T at 2.</li> </ul>

Order Exhibit U	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. U at 1–3.</li> </ul>
Order Exhibit V	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. V at 2–7, Internal Ex. A at 1–3, 5–7.</li> <li>Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Order Ex. V at 2–5, 7, Internal Ex. A at 1–6.</li> <li>A limited portion that reveals confidential information with language that Facebook has previously requested that the Court seal. Order Ex. V at Internal Ex. A at 5.</li> </ul>
Order Exhibit W	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Order Ex. W at 1–2.</li> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. W at 1, 3.</li> </ul>
Order Exhibit X	<ul style="list-style-type: none"> <li>Limited portions that reveal confidential information regarding Facebook's tool for responding to law-enforcement requests for user records. Order Ex. X at 1–2.</li> <li>Limited portions that reveal confidential information regarding Facebook's proprietary data systems and data storage and processing practices. Order Ex. X at 1–3.</li> </ul>

Good cause having been shown, Facebook's Administrative Motion to File Under Seal the Special Master's Amended Order Regarding Production of Named Plaintiff Data is GRANTED.

The Court hereby ORDERS:

1. The redacted version of the Order and its attached exhibits, as attached to the Declaration of Deborah Stein In Support Of Facebook's Administrative Motion to File Under Seal the Special Master's Amended Order Regarding Production of Named Plaintiff Data at Exhibit A, shall be filed on the public docket.
2. The unredacted version of the Order and its attached exhibits, as attached to the Declaration of Deborah Stein In Support Of Facebook's Administrative Motion to File Under Seal the Special Master's Amended Order Regarding Production of Named Plaintiff Data at Exhibit B, shall be sealed permanently.

**IT IS SO ORDERED.**

DATE: \_\_\_\_\_

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VINCE CHHABRIA  
United States District Judge